REVIEW SUMMARY REPORT – ADDITIONAL WORK
SECOND REVIEW – AUGUST 2015

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 320 West 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Chandra Tyler	Case No.: R-05560

Case Information

USTCF Claim No.: 4479	GeoTracker Global ID: T0603704683
Site Name: Shell #204-4530-1201	Site Address: 8873 Sunset Boulevard West Hollywood, CA 90069
Responsible Party: Equilon Enterprises, LLC Attn: Andrea Wing	Address: 20945 South Wilmington Ave. Carson, CA 90810
USTCF Expenditures to Date: $1,420,786	Number of Years Case Open: 29

To view all public documents for this case available on GeoTracker use the following URL:
http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603704683

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is a retail center and former commercial petroleum fueling facility. An unauthorized release was reported in April 1985. Approximately 200 cubic yards of impacted soil was excavated and disposed offsite in October 1988 after a site assessment. Approximately 825 cubic yards of impacted soil was excavated to a depth of 20 feet and disposed offsite in 1989. An additional 1,120 cubic yards impacted soil were excavated to a depth of 35 feet below ground surface (bgs) and disposed offsite in March 2004. Oxygen releasing compounds were placed at the bottoms of the soil excavations. Soil vapor extraction was found ineffective in 1993 and dual phase extraction was found ineffective in 2003. Groundwater extraction was conducted between June 1994 and March 2002, which removed 2.4 million gallons of contaminated groundwater. Active remediation has not been conducted at the Site for the past 11 years. Since 1992, 25 groundwater monitoring wells have been installed and monitored; 11 wells have been abandoned. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except near the source area around the off-site wells MW-11, MW-12 and MW-13.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the defined plume boundary. No other water supply wells have been identified within 1,000 feet of the defined plume boundary in files reviewed. The unauthorized release is located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected

shallow groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of the affected shallow groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case does not meet the Groundwater Policy Criterion. Although the most recent groundwater monitoring results suggest significant reductions of benzene concentrations in well MW-11, additional monitoring is necessary to establish definitive downward trends.
- Vapor Intrusion to Indoor Air: This case meets Policy Criterion 2b. A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion [*Wayne Perry, January 2014*] found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health.
- Direct Contact and Outdoor Air Exposure: This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the direct exposure pathway was performed by Fund staff. The assessment of site-specific risk from potential exposure to residual soil contamination found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. Soil excavations were conducted across the site to depths between 12 to 35 feet bgs. The Site is paved, occupied almost entirely by a commercial building, and accidental exposure to site soils is prevented. Any construction crew performing subsurface work will, per the requirements of Title 8 of the California Code of Regulations, be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Objections to Closure and Responses

According to the LTCP Checklist in GeoTracker, finalized on July 13, 2015, the Regional Water Board staff objects to UST case closure because:

- The case does not meet Policy groundwater criteria because groundwater plume stability has not been demonstrated.
  RESPONSE: We concur.
- The case does not meet policy criteria for vapor intrusion to indoor air.
- RESPONSE: We concur.

Recommendation

The Fund staff recommends additional groundwater monitoring to establish groundwater trends.

8/3/15

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8/3/15

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